

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

**02-20453CR-MOORE**  
CASE NO. \_\_\_\_\_

MAGISTRATE JUDGE  
O'SULLIVAN

UNITED STATES OF AMERICA )  
 )  
v. )  
 )  
DANIEL CHARBONEAU, )  
MICHAEL PUORRO, )  
MARSHALL KLEIN )  
and )  
CHRIS SAGNELLI, )  
 )  
Defendants. )  
\_\_\_\_\_ )

**MOTION TO SEAL**

The United States of America, by and through its undersigned Assistant United States Attorney, moves the Court for an order sealing the Indictment and related documents filed in this case, this motion to seal, and any sealing order issued pursuant to this motion. In support thereof, the government states:

1. This Indictment resulted from an investigation being conducted by the Federal Bureau of Investigation, involving the subject of this Indictment and other criminal activity of defendants **DANIEL CHARBONEAU, MICHAEL PUORRO, MARSHALL KLEIN and CRIS SAGNELLI**, as well as criminal activity of other proposed defendants.

2. Special Agents of the Federal Bureau of Investigation have informed the undersigned Assistant United States Attorney that they are conducting an undercover operation, which they anticipate will conclude in approximately June 2002, and that if the instant Indictment is not sealed, in their opinion, the undercover operation would be seriously compromised.

3. For reasons stated herein, the government respectfully requests that the Court enter

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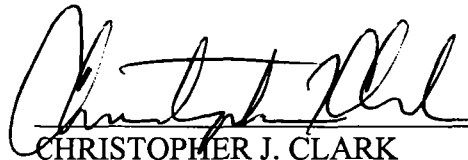
the attached proposed order, sealing until the arrest of any of the defendants or until further order of the Court, whichever occurs first: (1) the Indictment (along with accompanying certificate of attorney, penalty sheets, bond recommendation and arrest warrant) in this case, (2) this motion to seal, and (3) the attached sealing order.

Date: May 21, 2002

Respectfully submitted,

GUY A. LEWIS  
UNITED STATES ATTORNEY

By:

A handwritten signature in black ink, appearing to read "Christopher J. Clark", written over a horizontal line.

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